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UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

ROSEN MARIANO, an individual,

Plaintiff,

vs.

THE CITY OF LAS VEGAS, a political
subdivision of the State of Nevada;
CORRECTIONAL HEALTHCARE
COMPANIES, INC., a foreign corporation;
CORRECT CARE SOLUTIONS, LLC, a foreign
limited liability company; MICHELE
FREEMAN, Chief of Detention Enforcement for
the City of Las Vegas; CORRECTION OFFICER
DOE 1-10; HEALTHCARE WORKER DOES
11-20; DOES 21-99; inclusive; ROE
CORPORATIONS 100-199, inclusive,

Defendants.

CASE NO.: 2:18-CV-01911-APG-EJY

**STIPULATION AND ORDER TO
EXTEND DEADLINE TO FILE JOINT
PRETRIAL ORDER**

(Second Request)

WHEREAS, the Court granted in part, denied in part, Defendant Correct Care Solutions, LLC's initial Motion for Summary Judgment and reopened discovery. *See* ECF 69, Order filed August 20, 2021.



1 WHEREAS, the Court granted in part, denied in part, Defendant Correct Care Solutions,
2 LLC's second Motion for Summary Judgment. *See* ECF 110, Order filed September 21, 2023.

3 WHEREAS, on October 30, 2023, the Court entered an Order for Proposed Joint Pretrial order,
4 requiring the proposed Joint Pretrial Order to be filed by November 22, 2023. *See* ECF 111.

5 WHEREAS, on November 17, 2023, the Court executed the parties' Stipulation and Order to
6 Extend Deadline to the proposed Joint Pretrial Order (first request), which requested a brief extension
7 to December 13, 2023, to accommodate the parties in light of the Thanksgiving Holiday and to
8 accommodate Plaintiff's counsel's family matters.

9 WHEREAS, on November 19, 2023, the parties discussed the proposed Joint Pretrial Order by
10 telephone.

11 WHEREAS, during the telephone conference regarding the proposed Joint Pretrial Order on
12 November 29, 2023, the parties discussed that they have not engaged in settlement discussions through
13 the judicial settlement program or private mediation.

14 WHEREAS, during the telephone conference on November 29, 2023, the parties agreed to
15 mutually select a private mediator and to file the Joint Pretrial Order within thirty (30) days of the
16 conclusion of the mediation if a settlement is not reached.

17 WHEREAS, by December 4, 2023, all parties mutually agreed to select the Honorable David
18 Wall, a retired Las Vegas District Court judge, to serve as the mediator.

19 WHEREAS, as of December 4, 2023, the parties have obtained proposed dates from the
20 mediator and are working to schedule an in-person mediation at a mutually agreed upon date and time
21 by February 1.

22 WHEREAS, this Stipulation and Order is submitted in accordance LR IA 6-1.

23 WHEREAS, this is the parties' second request to extend the time for filing the proposed Joint
24 Pretrial Order.

25 WHEREAS, the parties' requested extension is not made in bad faith or to unnecessarily delay
26 these proceedings.

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1 IT IS HEREBY STIPULATED AND AGREED, between the parties, by and through their
2 respective counsel of record, that the parties have agreed to attend mediation and to extend the filing
3 of the joint pretrial order accordingly.

4 IT IS FURTHER STIPULATED AND AGREED that, in the event the parties are unable to
5 reach a settlement at mediation, the parties shall file a proposed Joint Pretrial Order within thirty (30)
6 days of the conclusion of the mediation.

7 THEREFORE, the Parties respectfully request the Court approve the foregoing stipulation.

8 DATED this 5th day of December, 2023

DATED this 5th day of December, 2023

9 **PRINCE LAW GROUP**

LEWIS BRISBOIS BISGAARD & SMITH

10 */s/ Dennis M. Prince*

/s/ Ethan M. Featherstone

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12 DENNIS M. PRINCE
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Attorneys for Defendant
Correct Care Solutions, LLC

17 DATED this 5th day of December, 2023

18 **LAS VEGAS CITY ATTORNEY'S OFFICE**

19 */s/ John A. Curtas*

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27 Attorneys for Defendants
28 *City of Las Vegas and Michelle Freeman*



ORDER

IT IS SO ORDERED.

DATED: December 5, 2023


UNITED STATES MAGISTRATE JUDGE